

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
Northern Division**

DORSYL WRIGHT

PLAINTIFF

VERSUS

CIVIL ACTION NO.: 3:20-cv-473-DPJ-FKB

JAMES R. MOORE, ET AL.

DEFENDANTS

**PLAINTIFF'S MOTION FOR ENLARGEMENT OF TIME TO MOVE FOR JOINDER
OF PARTIES OR AMENDMENTS TO PLEADINGS**

The Plaintiff, Dorsyl Wright, through her counsel of record, moves for a 60 day enlargement of time to file motions for joinder of parties or amendments to the pleadings. The Case Management Order [Doc. 41] sets today, Monday, February 7, 2022, as the deadline to file these motions.

As grounds for this Motion for time, the undersigned Plaintiff's counsel states that he intends to conduct limited discovery, as authorized by the CMO. Plaintiff's counsel represents that he intends to take the deposition of Defendants Deputy Scott and Kathy Davis on March 9, which has been agreed to by counsel opposite, and that he will be propounding basic discovery upon these defendants this week. Plaintiff's counsel reasonably believes that this discovery will help him in filing an amended complaint. A settlement conference is scheduled to be conducted Judge Ball on April 9, and that Plaintiff would file her motion to amend before that date.

For the foregoing reasons, the Plaintiff respectfully requests that she be granted a 60-day enlargement of time to file motions for joinder of parties or amendments to the pleadings.

Dated: February 7, 2022.

Respectfully submitted,

**DORSYL WRIGHT
PLAINTIFF**

/s/ Samuel L. Begley, Esq.
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The Plaintiff's Attorneys

Certificate of Service

I hereby certify that on February 7, 2022 I electronically filed the foregoing
with the Clerk of the Court using the ECF system which sent notification of such filing to
the following persons:

William R. Allen (#100541)
Lance W. Martin (MSB #105203)
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and I hereby certify that I have mailed by United States Postal Service or emailed the document
to the following non-ECF participants:

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/s/ Samuel L. Begley, Esq.